

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)
)
)
v.)
)
GLEN CASADA and) Case No. 3:22-CR-00282
CADE COTHREN) District Judge Eli J. Richardson
)
)
Defendants.)

**DEFENDANT CADE COTHREN'S
MOTION FOR JOINT SENTENCING GUIDELINES HEARING**

Defendant Cade Cothren, by and through undersigned counsel, hereby respectfully moves this Court to set a joint Sentencing Guidelines hearing for Mr. Cothren and Mr. Casada at 9 a.m. on September 12, 2025, followed by Mr. Casada's sentencing hearing at 1 p.m., and Mr. Cothren's sentencing hearing at 3 p.m., time permitting. Currently, Mr. Casada's sentencing hearing is set for September 12, 2025 at 9 a.m., and Mr. Cothren's sentencing hearing is set for September 12, 2025 at 1 p.m.

As the parties and the Court well know, the first step in the sentencing process is for the Court to correctly calculate a defendant's Guideline range. *See, e.g., Gall v. United States*, 552 U.S. 38, 49 (2007). Mr. Cothren's and Mr. Casada's objections to the Sentencing Guidelines calculations in their Pre-Sentence Reports overlap almost completely. Absent consolidation of this first step, the Court will be required to hear the parties' arguments and conduct this analysis twice in the same day. Because Mr. Casada's hearing immediately precedes Mr. Cothren's hearing, the Court will have already heard the government's argument and calculated the relevant Guidelines range before Mr. Cothren's hearing even begins. For these reasons, a consolidated hearing on the appropriate Sentencing Guidelines calculation(s) for Mr. Cothren and Mr. Casada will promote judicial efficiency and economy. A joint hearing will also allow Mr. Cothren the opportunity to present his own arguments in support of his

objections to the Sentencing Guidelines, which may be different from or augment, Mr. Casada's Guidelines arguments.

While joint Sentencing Guidelines hearings for co-defendants may be unusual, they are not unprecedented. The Middle District of Tennessee previously held a joint Sentencing Guidelines hearing on the issue of "loss" in a case involving seven defendants. *United States v. Hughes*, 97 F.3d 1453 (6th Cir. 1996) (attached hereto as **Exhibit A**). The Guidelines issue decided at the joint hearing was the one common to all defendants—the value of the stolen tires at issue in the case. *Id.*

Undersigned counsel has conferred with Assistant United States Attorney Taylor Phillips, who states that the government does not oppose a joint Sentencing Guidelines hearing in accordance with the schedule proposed above. Undersigned counsel has also conferred with counsel for Mr. Casada, who states Mr. Casada's preference is to keep the sentencing hearings separate.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on August 29, 2025, and service was made upon the following via CM/ECF and/or by email.

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